

IN THE CHANCERY COURT OF HICKMAN COUNTY, TENNESSEE

KEVIN P. LAVENDER, In his official  
capacity as Commissioner-In-  
Possession of Sentinel Trust Company  
and Receivership Management, Inc.,  
Receiver of Sentinel Trust Company,

Plaintiffs,

v.

DANNY N. BATES, et al.,

Defendants.

No. 4980

FILED

AM APR 30 2010 PM

LINDA A. GOSSETT, CLERK & MASTER  
BY: *[Signature]*

**PLAINTIFFS' MOTION TO SHORTEN TIME WITHIN WHICH DEFENDANTS  
DANNY BATES AND DEANNA JUNE BATES HAVE TO RESPOND TO  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

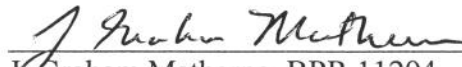
Rule 34.02 Tenn. R. Civ. P. allows the Court to shorten the typical thirty (30) day response time to Requests for Production of Documents. The Court entered a Restraining Order on April 29, 2010 restraining Defendants Danny Bates and Ms. Bates from transferring or encumbering property which the Court had earlier (in an April 7, 2010 Order) found to have been fraudulently transferred. In the Court's April 29, 2010 Restraining Order, the Court set a May 11, 2010 temporary injunction hearing.

Attached as **Exhibits A and B** are Requests for Production of Documents that are being served on Defendants Danny Bates and Ms. Bates. Those Requests for Production state that responsive documents are to be produced within the time allowed under the rules or as ordered by this Court -- referencing this Motion. See Exhibit A at 1 and Exhibit B at 1.

Plaintiffs need the documents requested to prepare for and to present at the May 11, 2010 temporary injunction hearing. A review of **Exhibits A** and **B** show that the requested documents are narrow in scope -- the documents Danny Bates and Ms. Bates have possession of relating to any efforts to transfer, convey, sale, pledge or encumber any of the properties listed in the Court's April 7, 2010 Order. Plaintiffs do not anticipate that the number of responsive documents will be large and, thus, shortening the time frame to respond should not be unduly burdensome.

Accordingly, Plaintiffs move the Court to order that Defendant Danny Bates and Defendant Deanna June Bates respond to the Requests for Production of Documents attached as **Exhibits A** and **B** hereto on or before 4:00 p.m. on Friday, May 7, 2010. Plaintiffs request that it be made clear in the Order that Danny Bates and Ms. Bates have their responses and responsive documents be in the hands of undersigned counsel by that May 7, 2010 date and time as opposed to Danny Bates and Ms. Bates simply mailing their responses and responsive documents on that date.

Respectfully submitted,

  
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### CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been served upon the following, via U.S. Mail, Federal Express and E-Mail as noted, on this the 30<sup>th</sup> day of April, 2010.

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